

**Small Quantity Generator Hazardous Waste Inspection
Compliance Evaluation Inspection**

For

**Boston Scientific
2405 West Orton Circle
West Valley City, Utah 84119**

Date. November 30, 2010

Facility Name Boston Scientific

EPA ID Numbers: UTR 000007849

Facility Contact Tony Christensen (Manager, Environmental Health & Safety)

Phone 801-974-1716

Facility Status Small Quantity Generator

Notification Generator

Part A None

Applicable Regulations R315-5, R315-7, R315-9, R315-13 and R315-16 of the Utah Administrative Code

Type of Inspection Compliance Evaluation Inspection (CEI)

Participants Rocky Stonestreet, DSHW
Ed Deputy, DSHW
Tony Christensen, Boston Scientific

Time in 9 30 am
Time out 10 45 am

Weather 22 degrees, sunny and no wind

Report Prepared by. Rocky Stonestreet

Facility Description

Boston Scientific is an international company that specializes in developing less invasive medical devices for the health care and medical industry. The West Valley facility specializes in making medical guide wires for placing catheters for the delivery of medicine and other types of treatment and diagnostic testing. The medical wires consist of nickel-titanium-platinum with a stainless steel core. All the components are soldered together.

Boston Scientific presently employs 110 full time employees at the West Valley City location. Their production and clerical staff is housed in a 144,000 sq. ft building. Boston Scientific has been at this location since 2004. Previous to this, Precision Vascular Systems occupied the building.

Waste Streams

The inspection began by reviewing the facility's hazardous waste manifests. The facility had two years of manifest on file at the facility. Tony indicated that the third year was archived in a separate building and not immediately assessable to their facility. In addition, the inspectors noted that the reviewed manifests were all missing the final generator copy.

Based on a review of their manifest it was determined that the facility generates approximately 750 pounds of hazardous waste per month, which consists primarily of flammable waste and corrosive waste. This is based on approximately 100 gallons of waste generated from isopropyl alcohol and acetone per month, as well as a de-burring process that generates approximately 100 lbs of hydrofluoric acid. The manifests show that Clean Harbors picks up their hazardous waste every two weeks and disposes it at their permitted hazardous waste landfill. The inspectors noted that the facility generates hazardous waste with codes consisting of D001, D002, F003 and U002. Based on a review of their manifests, the inspectors concluded that the facility is a small quantity generator of hazardous waste.

The inspectors observed the facility's hazardous waste storage and satellite accumulation practices. It was noted that 85% to 90% of the hazardous generation comes from the generation of flammable waste (isopropyl alcohol and acetone), the remainder is generated by their de-burring process (hydrofluoric acid). All waste containers were properly labeled, closed and in good condition. The inspectors noted that the facility had four satellite accumulation areas that were in control of the operator. In addition, because the facility has their waste picked up every two weeks there were no issues on quantity of waste in storage or days in accumulation. No concerns were observed.

R315-5 Hazardous Generator Requirements

- 5-1 Applicability Based on Boston Scientific's hazardous waste generation, the West Valley City facility can be considered to be a small quantity generator
- 5-1 11 Determination of Whether a Waste is a Hazardous Waste Based on the inspection, Boston Scientific has made a proper determination of their hazardous waste streams
- 5-1 12 Identification Numbers UTR 000007849
- 5-2 Manifest Boston Scientific had only two years of manifest on file at the facility. The reviewed manifests were all missing the "designated facility to generator copy"
- 5-3 Pre-Transportation Requirements Packaging, Labeling, Marking and Placarding No concerns
- 5-3 34 Accumulation Time No concerns
- 5-4 40 Record keeping No concerns
- 5-4 41 Biennial Reporting No concerns
- 5-4 42 Exception Reporting Not concerns
- 5-4 43 Additional Reporting Not concerns
- 5-5 Exports of Hazardous Waste Not applicable
- 5-6 Imports of Hazardous Waste Not applicable
- 5-7 Farmers Not applicable
- 5-8 Trans-frontier Shipments of Hazardous Waste for Recovery with the OECD Not applicable

R315-7 Interim Requirements for Hazardous Waste Facilities

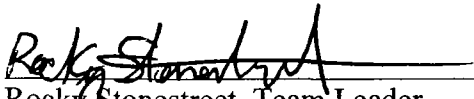
- 7-9 7 Personnel Training Not concerns
- 7-10 Preparedness/Prevention No concerns
- 7-11 Contingency/Emergency Plan Not concerns
- R315-9 Emergency Controls No concerns

R315-13 Land Disposal Restrictions

- 13-1 Boston Scientific does not treat their waste. The facility receiving their wastes certify's LDR

R315-16 Standards for Universal Waste Management

- 16-1 Scope
- 16-2 Standards for Small Quantity Generators of Universal Waste Boston Scientific uses lamp tracker - Waste Management picks up their used fluorescent tubes. No concerns


Rocky Stonestreet, Team Leader

Dec. 28, 2010
Date

Site Boston Scientific

ID# _____

Date Nov. 30, 2010**Hazardous Waste Inspection – Small Quantity Generator Checklist**

INSPECTION ITEM	CITATION	COMMENTS
<u>Waste Determination</u>		
Has the generator determined whether his solid waste is a hazardous waste?	R315-5-1 11 262 11	yes
Has a waste determination been made for each waste stream?	R315-2-3 262 3	yes
<u>Notification and EPA Hazardous Waste Identification Numbers</u>		
Has the generator notified of regulated activity and obtained an EPA ID#?	R315-5-1 12 262 12	yes
Has the generator offered his hazardous waste to a transporter or a treatment, storage, or disposal facility (TSDF) that does not have an EPA ID#?	R315-5-1 12 262 12	yes
<u>Manifest</u>		
Has the generator used the approved manifest form 8700-22 and 8700-22A for off-site transportation to a TSDF?	R315-5-2 20 (a) 262 20(a)	yes
Have all applicable sections of each manifest been filled out completely and legibly? (See attached manifest checklist)	R315-5-2	yes
Does the facility generate less than 1000 kg/month and use a contractual agreement to reclaim his waste?	R-315-5-2 20(e)(1) 262 20(e)	yes
Have copies of the reclamation agreements been kept on file for at least three years after termination of the agreement?	R-315-5-2 20(e)(2) 262 20(e)	N/A
<u>Record Keeping</u>		
Is the generator maintaining signed copies of the manifests for three years?	R-315-5-4 40(a) 262 40(a)	→ had 2 years at facility 3rd year archived.
Is the generator maintaining records of test results or waste analyses for hazardous waste determinations for at least three years?	R-315-5-4 40(c) 262 40(c)	→ yes
<u>Exception Reporting</u>		
Has the generator been required to prepare an Exception Report (if the TSDF does not return the generator's original copy of the manifest within 60 days)? If yes, the generator must submit a legible copy of the manifest to the Executive Secretary, with some indication that the confirmation of delivery to the TSDF has not been received	R315-5-4 42(b) 262 42(b)	No concerns
Has the generator kept a copy of each Exception Report for at least three years?	R315-5-4 40(b) 262 40(b)	Not applicable

Inspector's Initials RLS



Site _____ ID# _____ Date _____

Hazardous Waste Inspection – Small Quantity Generator Checklist

<u>INSPECTION ITEM</u>	<u>CITATION</u>	<u>COMMENTS</u>
<u>Packaging, Labeling, Marking, and Placarding</u> Are hazardous waste containers packaged, labeled, marked, and placarded in accordance with DOT 49 CFR prior to shipment?	R315-5-3 262 30, 262 31, 262 32, & 262 33	
<u>Accumulation Time</u> Has the generator stored hazardous wastes on-site for longer than 180 days or 270 days (if the wastes are transported over 200 miles to a TSDF) without a permit?	R315-5-3 34 262 34(d) & 262 34(e)	No concerns, 4 satellite accumulation areas
Has the generator ever accumulated more than 6000 kg of hazardous waste on-site?	R315-5-3 34 262 34(d)(1)	→ No
The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container of hazardous waste	R315-5-3 34 262 34(d)(4) 262 34(a)(2)	No concerns
While being accumulated on-site each container and tank is labeled or marked clearly with the words, "Hazardous Waste"	R315-5-3 34 262 34(d)(4) 262 34(a)(3)	
Does the facility have at least one person on the premises or on call (available to reach the facility in a short period of time) with the responsibility for coordinating all emergency response measures This employee is the emergency coordinator	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(i)	yes, Tony Christensen Bill Taft is back-up
Has the generator posted the following information next to the telephone Name and phone number of emergency coordinator, Location of fire extinguishers, spill control material, and if present, fire alarm, and Telephone number of the fire department, unless the facility has a direct alarm	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(ii)	No concerns
Does the generator ensure that all employees are thoroughly familiar with the hazardous waste handling and emergency procedures relevant to their positions?	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(iii)	yes
Will the Emergency Coordinator or his designee be available to respond to any emergencies that arise Applicable responses are specified in 262 34(d)(5)(iv)	R315-5-3 34 262 34(d)(5) 262 34(d)(5)(iv)	yes
<u>Use and Management of Containers</u> Are hazardous waste containers in good condition?	R315-5-3 34 262 34(d)(2) 265 171	yes



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Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Are the containers compatible with the hazardous waste?	262 34(d)(2) 265 172	 No concerns 
Are hazardous waste containers must be kept closed except when adding or removing waste	262 34(d)(2) 265 173(a)	
Are containers must not be opened, stored or handled in a way that may cause them to rupture or leak hazardous waste	262 34(d)(2) 265 173(b)	
Hazardous waste containers must be inspected weekly looking for unlabeled, leaking and deteriorated containers	262 34(d)(2) 265 174	
Are incompatible wastes must not be stored in the same containers	262 34(d)(2) 265 177(a)	
Are hazardous wastes placed in containers that previously held an incompatible waste?	262 34(d)(2) 265 177(b)	
Are incompatible hazardous wastes containers separated from incompatible wastes by means of a dike, berm, wall, or other device?	262 34(d)(2) 265 177(c)	<hr/> yes, no concerns yes yes
<u>Preparedness and Prevention</u>	R315-5-3 34	
Is the facility maintained and operated in a way to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste	262 34(d)(4) 265 31	
Does the facility have the following equipment unless the wastes stored do not pose the hazards that the equipment is designed to respond to internal communications or alarm capable of providing immediate emergency instructions (voice or signal) to facility personnel, a device capable of summoning outside emergency equipment (such as a telephone or a direct line to the fire department), portable fire extinguishers, fire control equipment, spill control equipment, decontamination equipment, water at adequate pressure and volume to supply fire fighting needs	262 34(d)(4) 265 32	
Does the facility must maintain and test, where necessary, all communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment to assure proper operation when needed	262 34(d)(4) 265 33	

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Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
Do facility personnel have immediate access to an alarm or emergency communication device whenever hazardous waste is handled and if there is ever just one employee on the premises during facility operation, does he have immediate access to a device (telephone or two-way radio) capable of summoning external emergency assistance?	262 34(d)(4) 265 34	yes
Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?	262 34(d)(4) 265 35	yes
Has the facility attempted to make arrangements with local fire, police, emergency response teams, and hospitals to respond to emergency situations? The facility must document any refusal to enter into such arrangements	262 34(d)(4) 265 37	yes, all three entities have been notified
Spill Response Take appropriate action to minimize threats to human health and the environment by notifying the Utah Department of Environmental Quality at (801) 536-4123 if more than 1 kg of acutely hazardous waste, 100 kg of hazardous waste or material which when spilled becomes a hazardous waste, or 25 gallons of used oil Provide information as required	R315-9 R315-9-1	<hr/>  No concerns
Notify and report to the National Response Center, at 800-424-8802, if required	R315-9-1 1	
Provide a written report including all information required in R315-9-4 to the Executive Secretary within 15 days after any spill of hazardous waste or material which becomes a hazardous waste when spilled and is reported under R315-9-1	R315-9-4	
Land Disposal Restrictions (LDR) Is the facility managing and treating hazardous waste to meet Land Disposal Restriction standards found at 268 40 The generator must also develop and follow a written waste analysis plan which describes the procedures they will carry out to comply with the treatment standards The waste analysis plan must be based on a chemical and physical analysis of a representative sample of the waste being treated Such plans must be kept in the facility's on-site files and available to inspectors Wastes shipped off-site pursuant to this paragraph must comply with the notification requirements of 268 7(a)(3)	R315-13-1 262 34(d)(4) 268 7(a)(5)	<hr/>  N/A, the flammable waste stream get's reused for ^{its} energy properties, at the Aragonite Incinerator

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Hazardous Waste Inspection – Small Quantity Generator Checklist


INSPECTION ITEM	CITATION	COMMENTS
If the hazardous waste meets the treatment standard at the original point of generation, with each initial shipment of waste or if the waste changes, the generator must send a one-time written notice to each treatment, storage, or disposal facility receiving the waste, and keep a copy in the file. The notice must include the information included in column "268 7(a)(3)" in the Table in 268 7(a)(4)	262 34(d)(4) 268 7(a)(5) 268 7(a)(3)	N/A
Does the facility maintain an assessment of LDR status on file for each hazardous waste generated at the facility	R315-13-1 268 7(a)	→ yes
A notice and certification that each hazardous waste is either not land disposal restricted, or if it is restricted, that it is land disposable after treatment, must accompany the original manifested shipment of hazardous waste or when the waste stream changes	R315-13-1 268 7(a)	→ No concerns
Maintain all LDR documentation for at least three years from the date the hazardous waste was shipped off-site	R315-13-1 268 7(a)(8)	→ yes
<u>Standards for Universal Waste Management</u> High mercury containing lamps must be recycled or disposed of as hazardous waste. Any broken lamps must be disposed of as a hazardous waste. Do not dispose of high mercury containing lamps in the regular trash or dumpster.	R315-16 R315-16-2	↑
Container of mercury containing lamps must be closed and labeled "Universal Waste Lamps", "Waste Lamps", or "Used Lamps"	R315-16-2	No concerns
Universal waste lamps should not be accumulated for longer than one year	R315-16-2	↓
Are rechargeable batteries recycled or managed as a hazardous waste, kept in a closed container labeled "Universal Waste Batteries", and not accumulated for longer than one year	R315-16-2	

Site Boston Scientific ID# UTR 000007849 Date Nov. 30, 2010

Hazardous Waste Inspection – Small Quantity Generator Checkst

INSPECTION ITEM	CITATION		COMMENTS	
<u>Manifest Number (box)</u>	# <u>002322950</u>	# <u>001148918</u>	# <u>001148880</u>	# <u>001148791</u>
<u>Generator EPA ID #</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>R315-5-2 (box 1</u>				
<u>Generator information</u>				
<u>Mailing Address (box 5)</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>Phone number</u>				
<u>Transporter #1 information</u>				
<u>Company Name (box 6)</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>EPA ID# (box 6)</u>				
<u>Transporter #2 information</u>				
<u>Company Name (box 7)</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>EPA ID # (box 7)</u>				
<u>Designated Facility information</u>				
<u>Name and Address (box 8)</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>EPA ID # (box 8)</u>				
<u>Phone Number (box 8)</u>				
<u>Waste shipping requirements</u>				
<u>DOT Description (including proper name, Hazard class and ID#)</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>(box 9b)</u>	↓	↓	↓	↓
<u>(box 9a "X" if hazardous materials)</u>				
<u>Containers No & Type (box 10)</u>	↓	↓	↓	↓
<u>Total Quantity (box 11)</u>				
<u>Unit – Wt/Vol (box 12)</u>				
<u>Waste Codes (box 13)</u>				
<u>Special Handling Instructions (box 14)</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>Manifest Certifications</u>				
<u>Generator's Signature (box 15)</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>	<u>OK</u>
<u>International Shipments (box 16)</u>	↓	↓	↓	↓
<u>Transporter's Signature (box 17)</u>				
<u>Discrepancy Indication (box 18)</u>				
<u>Hazardous Waste Report Management Method Codes (box 19)</u>	↓	↓	↓	↓
<u>Facility Signature (box 20)</u>	<u>Missing</u>	<u>Missing</u>	<u>Missing</u>	<u>Missing</u>
<u>Final Observations and Comments</u>	<u>All these</u>	<u>manifest</u>	<u>missing the</u>	
	<u>"Designated</u>	<u>Facility</u>	<u>to Generator</u>	<u>Copy"</u>

Inspector's Initials



Hazardous Waste Inspection – Small Quantity Generator Checklist

INSPECTION ITEM	CITATION	COMMENTS
<u>Requirements for SOGs that Accumulate Hazardous Waste in Tanks</u>	262 34(d)(3) 265 201	
A generator may accumulate hazardous waste in tanks for less than 180 days (or 270 days if the generator must ship the waste greater than 200 miles), and may not accumulate over 6,000 kg on-site at any time	R315-5-3 34 262 34(d)(3) 265 201(a)	
Treatment or storage of hazardous waste in tanks must not generate extreme heat or pressure, fire or explosion, or violent reaction, produce toxic mists, fumes, dusts, or gases, produce uncontrolled flammable fumes or gases, damage the device or facility containing the waste, or threaten human health or the environment	R315-5-3 34 262 34(d)(3) 265 201(b)(1)	
Hazardous waste or treatment reagents must not be placed in a tank if it could cause it to fail	R315-5-3 34 262 34(d)(3) 265 201(b)(2)	
Uncovered tanks must have 2 feet of freeboard, unless the tank has a containment structure that equals or exceeds the volume of the top 2 feet of the tank	R315-5-3 34 262 34(d)(3) 265 201(b)(3)	
If hazardous waste is continuously fed into a tank, the tank must be equipped to the inflow (waste feed cutoff or bypass system to stand-by tank)	R315-5-3 34 262 34(d)(3) 265 201(b)(4)	
Small Quantity Generators that store hazardous waste in tanks must inspect, where present	262 34(d)(3) 265 201(c)	
Discharge control equipment at least once each operating day to ensure good working order	262 34(d)(3) 265 201(c)(1)	
Data from monitoring equipment at least once each operating day to ensure that the tank is operated to its designs	262 34(d)(3) 265 201(c)(2)	
The level of the waste in the tank at least once each operating day to ensure compliance with freeboard, if required	262 34(d)(3) 265 201(c)(3)	
The tank construction materials at least weekly to detect corrosion or leaking seams or fixtures	262 34(d)(3) 265 201(c)(4)	
The construction and surrounding area of discharge confinement structures at least weekly to detect erosion or signs of leakage	262 34(d)(3) 265 201(c)(5)	

N/A

